European Center for Not-for-Profit Law
ECNL
Privacy Notice
Effective: as of 25 May 2018
1. Data of the Controller:
   Name: ECNL Európai Nonprofit Jogi Központ Szolgáltató Nonprofit Kft. (European Center for Non-for-Profit Law)
   Registered address: H-1052 Budapest, Apáczai Csere János utca 17.
   Mailing address: H-1052 Budapest, Apáczai Csere János utca 17, 1. em. 1.
   Company registration number: Cg. 01-09-921425
   Telephone: +36 1 318 6923 / 483 177
   Website: [http://ecnl.org](http://ecnl.org)
   Twitter page: [https://twitter.com/enablingNGOLaw](https://twitter.com/enablingNGOLaw)

2. Purpose and term of the Privacy Notice:
   This Privacy Notice aims to ensure in terms of the data processed by ECNL Európai Nonprofit Jogi Központ Szolgáltató Nonprofit Kft. (European Center for Non-for-Profit Law) as data controller (hereinafter: “Controller” or “controller”), the enforcement of data protection principles and data security requirements, to prevent unauthorised access, changing and unauthorised disclosure of data, and to establish the rules of maintaining data protection-related records kept by the Controller. This Notice applies to all personal, sensitive and public data held by the Controller and its organisational units, and the full scope of data processing operations performed on them, regardless of their origin, use, place of processing or form of display. The Controller accepts the content of this Notice as binding upon itself, and undertakes the obligation to ensure compliance of all data processing with the laws in effect.

3. Legal background to the Privacy Notice:
   The Controller processes data and ensures their protection in accordance with its own internal privacy policy, and the following laws:
   - Act CXII of 2011 on Informational Self-Determination and Freedom of Information (“Privacy Act”);
   - Act LXVI of 1992 on Keeping Records on the Personal Data and Address of Citizens;
   - Act C of 2000 on Accounting;
   - Act V of 2013 on the Civil Code (“Civil Code”);
   - Act CXIX of 1995 on the control of name and address data facilitating research and direct business acquisition,
   - Act CVIII of 2001 on Certain Aspects of Electronic Commerce and Information Society Services (Act on E-Commerce),
   - Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities,

4. General principles of data processing:
   The Controller will perform data processing complying with the following aspects (principles):
   - **Lawfulness, fair processing and transparency:** Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.
• **Purpose limitation:** Personal data may only be processed for a specified reason. Personal data may only be collected for a specified, explicit and legitimate purpose, and the controller may not process them in a manner incompatible with these purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes will not be considered to be incompatible with the initial purposes.

• **Data minimisation:** Personal data may only be processed if adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. Personal data may only be processed to the extent and for the time necessary for the realisation of the purpose.

• **Data quality (accuracy):** The controller always has to record the personal data obtained from the data subject accurately. The data must be accurate and complete, and they must be kept up to date where necessary.

• **Storage limitation:** Personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. Personal data may only be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organisational measures required in order to safeguard the rights and freedoms of the data subjects. If the purpose of data processing has been achieved, the processed personal data must be erased.

• **Integrity and confidentiality:** Data processing operations must be designed and implemented in a manner that ensures appropriate security of the personal data, and the protection of the privacy of data subjects (including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage) using appropriate technical or organisational measures. The controller, or within its scope of activities, the processor must ensure the security of data and, taking the state of the art into account, it must take the technical and organisational measures and establish the rules of procedure that are necessary to ensure data security.

• **Accountability:** The controller is responsible for, and must be able to demonstrate compliance with the above-detailed principles and aspects of data processing.

5. **Data processing and data transmissions**

From all data processing operations performed by the Controller, this Notice provides adequate information on data processing under the Controller’s own internal policy, in accordance with the provisions of the Privacy Act and the GDPR, and the applicable statements adopted by the Hungarian National Authority for Data Protection and Freedom of Information (NAIH).

I. **Data processing related to activities pursued online and/or offline**

• Attendance sheets, lists of participants
• Photo recording

**Attendance sheets, lists of participants**

For each of its events the Controller prepares an attendance sheet or list of participants where the Controller or the contracted data processor registers the personal data of the attendees. The primary purpose of processing is to verify the incurred event expenses to the projects’ donors and to comply with accounting requirements.
The attendance sheet includes the controller’s logo and further information relevant to the event (place and date of the event, name of co-organizers, donors, etc.). The footer of the attendance sheet informs that by signing the attendance sheet the participants of the event confirm that the Controller might use the photos taken about them at the conference: the purpose of photographing is detailed under the chapter “Photo recording” of the Controller’s own privacy policy and the information can be found in the Privacy Notice below and in the official records under the registration numbers NAIH – 143900/2018., and NAIH – 143899/2018. The Controller handles personal data acquired by the present data processing for the purpose of maintaining customer relationship which is regulated in the chapter „Data processing for maintaining customer relationship“ of the Controller’s own privacy policy. In the course of pursuing this data processing goal, the Controller refrains from selling the collected personal data, spamming the natural persons affected by the data processing and any other unlawful transmission of the data.

In case of project(s) financed by the European Union the attendance sheet includes a so called „gender statistics” section. On the list of participants of the respective events participants shall mark their gender so that the Controller can disclose in its reports of the European Union financed projects the gender diversity ratio of natural persons attending its events. This obligation derives from the following European Union directive: „The mandatory EU Gender Action Plan 2016–2020 includes the mainstreaming as one of the three specific approaches to be implemented in the programming of development initiatives, together with a political and policy dialogue and the promotion of specific actions for gender equality and women’s and girls’ rights.” The current list of the European Union funded projects covered by this paragraph can be found in the annexes of the Controller’s internal policy.

The controller is obliged to keep its record for specified periods as follows:
- Documents issued under USAID-funded programmes must be retained for an additional period of 3 years (consequently documents incurred during a 7 years project should be retained for 10 years). The legal background of data processing is as follows: „2 CFR 200.333 - retention requirements for records” which can be accessed on the following link: https://www.govregs.com/regulations/expand/title2_chapterI_part200_subpartD_subjgrp34_section200.333#title2_chapterI_part200_subpartD_subjgrp34_section200.333
- Documents issued in connection with projects financed by the European Union shall be kept for 5 years by the Controller. The legal background of data processing is as follows: https://ec.europa.eu/clima/sites/clima/files/paris_agreement/docs/annex_g_ii_general_conditions_en.pdf

Pursuant to para 44 of the GDPR “processing should be lawful where it is necessary in the context of a contract or the intention to enter into a contract.” The Controller aims to meet the condition set in the 6th Annex of its Grant Agreement. Additionally, the EU Gender Action Plan 2016–2020 considers certain personal data of natural person relevant to events are considered as data for processing. As a result, data processing performed in the course of fulfilling requirements of contractual relationship with the EU or performing accounting exercises is to be considered under the point (b) of paragraph (1) of Section 5 of the Privacy Act: “Personal data may be processed (...) when processing is necessary as decreed by law or by a local authority based on authorization conferred by law concerning specific data defined therein for the performance of a task carried out in the public interest”
Data processing does not have a registration number, as it meets the criteria of customer contact. For this reason, NAIH does not keep any record of such processing.

## Data processing via filling in and signing attendance sheets:

<table>
<thead>
<tr>
<th>Personal data</th>
<th>Purpose of processing</th>
<th>Legal ground of processing</th>
<th>Source of data</th>
<th>Duration of processing</th>
</tr>
</thead>
<tbody>
<tr>
<td>First and last name</td>
<td>Compliance with accounting and project reporting requirements, expense verification.</td>
<td>Act C of 2000 on Accounting</td>
<td>Collected directly from the data subject</td>
<td>USAID financed projects: 3 years, European Union financed projects: 5 years.</td>
</tr>
<tr>
<td>Organisation represented by the data subject</td>
<td>Compliance with accounting and project reporting requirements, expense verification.</td>
<td>Act C of 2000 on Accounting</td>
<td>Collected directly from the data subject</td>
<td>USAID financed projects: 3 years after the project closure, European Union financed projects: 5 years.</td>
</tr>
<tr>
<td>Signature of the data subject</td>
<td>Compliance with accounting and project reporting requirements, expense verification.</td>
<td>Act C of 2000 on Accounting</td>
<td>Collected directly from the data subject</td>
<td>USAID financed projects: 3 years after the project closure, European Union financed projects: 5 years.</td>
</tr>
</tbody>
</table>

## Projects supported by the European Union:

| Gender identity of the participants | Complying with the obligation set by the EU Gender Action Plan 2016-2020. | “The mandatory EU Gender Action Plan 2016-2020 includes the mainstreaming as one of the three specific approaches to be implemented in the programming of development initiatives, together with a political and policy dialogue and the promotion of specific actions for gender equality and women’s and girls’ rights.” | Collected directly from the data subject | European Union financed projects: 5 years. |
Photo recording

The controller or its contracted agent prepares photographs at its events. The controller processes the photographs taken by the controller itself or received by the photographer in a closed manner: if the images were prepared by the controller - electronically, in a separate folder on its network; if the images were received in e-mail – electronically, also in a separate folder on its network and the controller deletes images from its mailbox. Only employees with network access can access the photographs taken about the concerned data subjects.

Controller grants the data subject possibility to declare if they give their consent or refrain from that the controller uses the photographs in accordance with the present notice. The footer of the attendance sheet informs participants that by signing the sheet they give their consent to the controller to use the photographs taken about them. In case a natural person wants to attend the event but do not want to be photographed can declare by ticking the relevant column of the participant sheet that s/he does not give its consent to the data processing in question.

Photographs can be taken only about those natural persons who registered to the event and by this means have been properly informed about the data processing in question and could give their consent to the data processing. The photographs taken are used in accordance with the acquired consent, primarily for reporting purposes. In some case the controller publishes photographs on its webpage and social media platform(s) – listed on the first page of the present information notice - which can be seen by the natural persons following the controller’s pages. By giving its consent the data subject acknowledges that the controller retains the right to publish the photographs in accordance with the present Information Notice, in respect of which the Controller enables the enforceability of the right of data subject data subject. If photographs are made of natural persons who did not give their consent to the data processing specified in this chapter (eg. s/he appears in the background of the photo taken of a natural person who gave its consent) the Controller makes sure that these persons right to self-determination is not violated by refraining from publishing or making accessible for the general public the concerned photographs.

Registration number of data processing:
- NAIH – 143900/2018. (other; related to publishing on social media sites)
- NAIH – 143899/2018. (other; compliant reporting to the controlling body to justify the performance of the event).

<table>
<thead>
<tr>
<th>Personal data</th>
<th>Purpose of processing</th>
<th>Legal ground of processing</th>
<th>Source of data</th>
<th>Duration of processing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Photograph about the data subject</td>
<td>Compliant reporting, publishing on its web/ social media platforms in certain cases</td>
<td>Data subject’s consent</td>
<td>Attained directly from the data subject</td>
<td>Till the erasure on request of the data subject</td>
</tr>
</tbody>
</table>
6. Rules of data processing:

Right of data subjects:

I. The data subject has the right, in connection with his or her personal data processed by the controller or a processor acting on its behalf or upon its instructions, in accordance with the terms specified in the Privacy Act:

a) to receive information on the facts related to processing prior to the start of processing (right to prior information),

b) at his/her request, to receive his/her personal data and information on their processing from the controller (right of access),

c) at his/her request, and in the other cases specified in this chapter, to have the controller rectify or supplement his/her personal data (right to rectification),

d) at his/her request, and in the other cases specified in this chapter, to have the controller restrict the processing of his/her personal data (right to restrict data processing),

e) at his/her request, and in the other cases specified in this chapter, to have the controller erase his/her personal data (right to erasure),

f) to initiate a procedure by the Authority (right to administrative legal remedy); and

g) to initiate a court procedure (right to judicial remedy);

II. In accordance with the paragraph above, the data subject is entitled to request:

a) information on the processing of his/her personal data
   1. The data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the relevant information.

b) rectification of personal data:
   2. The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking the purposes of the processing into account, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

c) erasure and blocking of his/her personal data:
   3. The data subject has the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller has the obligation to erase personal data without undue delay provided that the other conditions are met.

d) restriction of the processing of personal data:
   4. The data subject has the right to obtain the restriction of processing from the controller where one of the following applies:
      i. the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
      ii. the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
      iii. the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment or exercise of or defence against legal claims; or
      iv. the data subject has objected to processing pending the establishment of whether the legitimate grounds of the controller override those of the data subject.
In order to facilitate the exercise of the data subjects’ rights, the controller may provide them with templates (forms) containing the substantive content elements of the requests.

III. Furthermore, the data subject is entitled to:

a) receive his/her personal data in a machine-readable format:

The data subject has the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where processing is based on voluntary consent or contract and is automated.

b) object against data processing:

Where personal data are processed for direct marketing purposes, the data subject has the right to object at any time to the processing of personal data concerning him or her for such marketing, which includes profiling, to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

c) not to be subject to a decision based solely on automated processing:

The data subject has the right not to be subject to a decision which is based solely on automated processing, including profiling, which produces legal effects concerning him or her or affects him or her to a similarly significant degree.

Enforcement of the data subject’s rights:

I. In order to enforce the data subject’s rights, the controller:

a) gives any notification and information to be sent to the data subject in the cases specified in the Privacy Act and in this Notice in an easily accessible and readable format, in a concise, clear and easily understandable manner.

5. The controller makes the privacy notice available by electronic means on its website, either as a separate attachment or as a subpage, and in its online registration forms as a link, as well as in hard copy at places where the data subjects can find it upon the commencement of processing.

b) it adjudicates the request submitted by the data subject for the enforcement of his or her rights within the shortest possible time from submission, but in any case, within 25 days at most, and communicates its decision to the data subject in writing or electronically, if the data subject has submitted its request by electronic means.

6. The controller receives requests for the enforcement of the data subject’s rights at any of its contact points specified in main section 1 of this Notice.

Right of information:

Information provided at the time when personal data are obtained:

I. Where personal data relating to a data subject comes under the processing of the controller from the data subject, the controller will, at the time when personal data are obtained, provide the data subject with all of the following information:
a) the identity and the contact details of the controller and of the controller’s representative;
b) the purposes of the processing for which the personal data are intended, as well as the legal basis for their processing;
c) if personal data are not obtained from the data subject: categories of the personal data concerned;
d) the recipients or categories of recipients of the personal data, if any.

II. In addition to the information mentioned in section I, the data subject must also be informed of the following additional details:

a) the retention period applicable to the personal data or, if that is not possible, the criteria used to determine that period;
b) the existence of the right to request, from the controller, access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing, as well as the right to data portability;
c) where the processing is based on voluntary consent, the data subject has the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
d) the right to lodge a complaint with the supervisory authority;
e) whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data

III. The rules of procedure referred to in sections I and II constitute the controller’s information provision practice. Before starting the processing, the controller makes information provision possible publicly, with understandable and transparent content by publishing the effective (and former, if any) privacy notice(s) on its website, which it also provides to the data subject in hard copy upon the start of processing, i.e. when the personal data are obtained.

IV. In addition, the controller will communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. At his or her request, the controller informs the data subject of the recipients of the data transmissions concerned.

V. The controller communicates any personal data breach to the data subject without undue delay if a personal data breach is likely to result in a high risk to the rights and freedoms of natural persons within the controller’s system.

VI. If the controller or the processor acting on its behalf or upon its instructions denies the data subject’s request specified in paragraphs I and II of the chapter on “the data subject’s rights” in this Notice for the rectification, erasure or restriction of processing, it will promptly inform the data subject in writing of

a) the fact of denial, its legal and factual reasons, and
b) the rights granted to the data subject by the Privacy Act, as well as the way to exercise them, in particular that the data subject can also exercise his or her right to rectification, erasure or the restriction of processing of the personal data processed by the controller or the processor acting on behalf of it and upon its instructions with the involvement of the Authority.

Prior information:
I. In order to ensure the enforcement of the right to prior information, before the data processing operations performed by the controller or by the processor proceeding on its behalf or upon its instructions, or at the latest before starting the first data processing operation, the controller will promptly make the following information available to the data subject:
   a) the designation and contact details of the controller and, if a processing operation is performed by a processor, those of the processor;
   b) the contact details of the data protection officer;
   c) the purpose of the planned data protection; and
   d) the rights granted to the data subject by the Privacy Act and the Controller’s own policy, together with the description of the way of enforcing them.

II. Simultaneously with the details listed in paragraph I, the controller provides information to the data subject in the same way or addressed to the data subject on
   a) the legal ground of processing;
   b) the retention period of personal data processed, and how this period has been determined;
   c) if the processed personal data are transmitted or planned to be transmitted, the scope of recipients of data transmission, including third-country recipients and international organisations;
   d) the source from which processed personal data are collected; and
   e) all other substantive facts in connection with the circumstances of processing.

III. The controller may delay the provision of the information specified in paragraph II in proportion to the objective to be attained, or restrict the content of information provided, or omit the provision of information if this measure is indispensable in order to ensure:
   a) the effective and efficient conduct of examinations or proceedings performed by it or with its involvement, in particular criminal proceedings;
   b) the effective and efficient prevention and detection of criminal offences;
   c) the enforcement of punishments and measures applied against perpetrators of criminal offences;
   d) the effective and efficient protection of public security;
   e) the effective and efficient protection of the external and internal security of the state, in particular defence and national security; or
   f) the protection of the fundamental rights of third persons.

Right of access:
I. The data subject is entitled, at his/her request, to receive his/her personal data and information on their processing from the controller.
II. In order to ensure the right of access, at the data subject’s request, the controller specifies whether his or her personal data are processed by the controller itself or by a processor acting on its behalf and at its instructions.

III. If the personal data of the data subject are processed by the controller or by a processor on its behalf and upon its instructions, in addition to the details listed in paragraph II, the controller will provide the data subject with the personal data processed by it and by a processor acting on its behalf and upon its instructions and inform him or her of:
   a) the source of the personal data processed;
   b) the purpose of and legal ground for processing;
   c) the scope of the personal data processed;
   d) if the personal data processed are transmitted, the scope of recipients of data transmission, including third-country recipients and international organisations;
   e) the retention period of processed personal data, and the way this period has been determined;
   f) the rights granted to the data subject by the Privacy Act, together with the description of the way of enforcing them;
   g) if profiling is applied, this fact, and
   h) the circumstances of any occurrence of personal data breaches arising in connection with the processing of the data subject’s personal data, their impact and the measures taken to manage them.

IV. The controller may restrict or refuse the data subject’s right of access in proportion to the purpose to be attained if this measure is indispensable to pursue any interest specified in paragraph II of the chapter on “prior information” in this Notice.

V. If the measure under paragraph III is applied, the controller informs the data subject promptly of:
   a) the fact that access is restricted or refused, and its legal and factual reasons, if the provision of this information to the data subject does not endanger the realisation of any interest specified in paragraph II of the chapter on “prior information” in this Notice; and
   b) the rights granted to the data subject by the Privacy Act, as well as the way of exercising them, in particular that the data subject can also exercise his or her right of access with the involvement of the Authority.

Rectification:
I. The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking the purposes of the processing into account, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

II. In order to ensure the enforcement of the right to rectification, if the personal data processed by the controller or by a processor on its behalf and upon its instructions are inaccurate, incorrect or incomplete, it will promptly rectify or correct them, especially at the data subject’s request or, if it is
compatible with the purpose of processing, it supplements them with additional personal data provided by the data subject or with a declaration made by the data subject concerning the processed personal data.

III. The controller is exempted from the rectification obligation if
   a) no accurate, correct and complete data is available, and the data subject does not make such data available either; or
   b) the veracity of the personal data provided to it by the data subject cannot be established without doubt.

IV. If the controller rectifies the personal data processed by it or by a processor acting on its behalf and upon its instructions, it will inform the controller to which it transmitted the personal data affected by the rectification of this fact and of the rectified personal data.

Restriction:
I. During the period of the restriction on processing, apart from storing, the controller or the processor acting on its behalf and upon its instructions may only perform any other processing operation on the personal data subject to restriction in order to enforce the data subject’s legitimate interest or as specified by an act, international agreement or a binding legal act of the European Union.

II. If the restriction on processing is lifted, the controller will inform the data subject of this fact in advance.

Erasure:
In order to enforce the right to erasure, the controller will promptly erase the data subject’s personal data if
   a) processing is unlawful, in particular if
      i. processing is contrary to the principles of data protection;
      ii. its purpose has ceased to exist or no further processing is necessary for the realisation of the purpose of processing;
      iii. its duration specified by an act, international agreement or a binding legal act of the European Union has elapsed; or
      iv. its legal ground has ceased to exist and there is no other legal ground for the processing of data;
   b) the data subject withdraws his or her consent to processing or requests the erasure of his or her personal data, except for the cases specified in the Privacy Act;
   c) a legal provision, a Union legal act, the Authority or a court orders erasure of the data; or
   d) the period specified in the relevant provision of the Privacy Act has elapsed.
7. Legal remedy:
Should the data subject have any question or problem in connection with the processing, he or she may contact the controller using the contact details specified in section 1 of this Notice.

The controller assigns a filing number to the letters and customer inquiries received via post or fax, then retains them in its system for 5 years with the sender’s name and the date of receipt.
The controller deletes incoming emails with the sender’s name and email address, as well as any other voluntarily provided personal data, no later than after the lapse of 5 years from data provision.

The data subject may turn to the Hungarian National Authority for Data Protection and Freedom of Information with any complaint in connection with the processing:

- Name of the authority: Hungarian National Authority for Data Protection and Freedom of Information
- Abbreviated name of the authority: NAIH
- Registered address: H-1024 Budapest, Szilágyi Erzsébet fasor 22/C.
- Website: www.naih.hu
- Email: ugyfelszolgalat@naih.hu

8. Closing provisions
In issues not regulated in this Notice, the provisions of the Privacy Act in effect at that time and the other laws listed in Section 3 of this Notice shall be governing.

Courts, public prosecutors, law enforcement agencies, authorities dealing with administrative offences, the Hungarian National Authority for Data Protection and Freedom of Information and other bodies authorised by law may send inquiries to the controller to request the provision of information and the disclosure or transmission of data or documents.

If the authority explicitly specifies the purpose and the scope of data, the Controller will only disclose personal data to the authorities in the quantity and to the extent that is indispensable for the realisation of the purpose of the request.

The controller does not check personal data provided to it, neither at the time of obtaining them nor any time following that. The person providing the data is exclusively responsible for the adequacy of the data provided. With the provision of his/her email address, the data subject assumes liability for ensuring that he/she will be the exclusive user of the service from the email address provided.

The controller reserves the right to unilaterally amend this Privacy Notice subject to notification to the data subjects. The Controller will allow sufficient time between the announcement and the effective date of the amendment for the data subjects to become familiar with the content of the amended Policy.